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SCHOOL DISTRICT, AMANDA
7 CHANN, and LEANN IACUONE

8
9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**

11
12 SAVE GIRLS' SPORTS, an
unincorporated California association;
13 T.S., a minor by and through her father
and natural guardian, RYAN
14 STARLING, individually, and on
behalf of all others similarly situated;
15 and K.S., a minor by and through her
father and mother and natural
16 guardians, DANIEL SLAVIN and
CYNTHIA SLAVIN, individually, and
17 on behalf of all others similarly
situated;

18 Plaintiffs,

19 vs.

20 TONY THURMOND, in his official
capacity as State Superintendent of
21 Public Instruction; ROB BONTA, in his
official capacity as State Attorney
22 General; RIVERSIDE UNIFIED
SCHOOL DISTRICT; LEANN
23 IACUONE, Principal of Martin Luther
King High School, in her personal and
24 official capacity; and AMANDA
CHANN, Assistant Principal and
25 Athletic Director of Martin Luther King
High School, in her personal and
26 official capacity,

27 Defendants.
28

CASE NO. 5:24-cv-02480-SSS (SPx)

**DECLARATION OF MILTON E.
FOSTER III IN SUPPORT OF
MOTION TO DISMISS**

The Hon. Sunshine Suzanne Sykes

Trial Date: None Set

*(Filed concurrently with 1) Motion to Dismiss
Complaint; 2) Request for Judicial Notice; 3)
[Proposed] Order)*

1
2 I, Milton E. Foster III, declare as follows:

3 1. I am an attorney duly admitted to practice before this Court. I am a
4 partner with Fagen Friedman & Fulfroft, LLP, attorneys of record for RIVERSIDE
5 UNIFIED SCHOOL DISTRICT (“District”), DR. LEANN IACUONE, and
6 AMANDA CHANN. If called as a witness, I could and would competently testify
7 to all facts within my personal knowledge except where stated upon information and
8 belief.

9 2. Exhibit A attached to this Declaration is a true and correct copy of the
10 Mt. SAC Cross Country Invite High School Division Course Map.

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct.

13 Executed on this 28th day of February, 2025, at Corona, California.

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16 

17 Milton E. Foster III
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Exhibit A





MAP LEGEND

HIGH SCHOOL DIVISION

MAP LEGEND



PARKING LOTS

XC Invite Parking (Team Vans/Buses only in Lot F)



WALKING PATHS

Green within stadium/Orange outside stadium gates



ACCESS TO OPEN AREA



BRIDGE/OVERPASS



BLOCKED ACCESS



MEDICAL - ATHLETIC TRAINING ROOM

Medical staff stationed throughout course



RESTROOMS

①

TEAM BUS PARKING

Lot L

②

TEAM CHECK-IN

Packet Pick-Up

③

TEAM CAMP AREA/ACCESS POINTS

Team Camps are on the 1st floor of the Champions Parking Structure and on the field behind the scoreboard

④

PROBLEM SOLVING SHED

Questions and issues resolved here!

⑤

WARM-UP

Warm-ups area is on the track or on first floor of Champions Parking Structure

⑥

CLERK OF THE COURSE

Check-In 10 minutes prior to race

⑦

SOUVENIR SALES

⑧

AWARDS

Top 3 Teams in each race (after results are posted)

⑨

EXPO AREA



OFF LIMITS AREAS

*Coaches allowed on the westside of the airstrip.
Staff Only on airstrip asphalt, stadium track/field.*

COURSE MAP LEGEND



START LINE



FINISH LINE



COURSE PATH



FIRST MILE



SECOND MILE



THIRD MILE



MILE MARKERS



HALF MILE MARKERS

TEAM ARRIVAL PROTOCOL

1. PARKING (1)

All school vehicles (vans or buses) must park in Lot F. No parking charge for marked school vehicles and school buses in this lot ONLY.

2. ENTERING THE STADIUM (2)

Coaches and athletes must enter through the Team Check in Gate (2).

3. TEAM CAMP/TEAM CAMP ACCESS (3)

Setup your team camp in:

1. **Designated** areas on the field behind the scoreboard
2. On the first floor of the Champions Parking Structure.
3. In the stadium East or West upper levels.
Tents/umbrellas are ONLY ALLOWED on the upper level of the EAST BLEACHERS (opposite side of the pressbox).

PROOF OF SERVICE

T.S. and K.S. v. Riverside Unified School District, et al.
Case No. 5:24-cv-02480-SSS (SPx)

STATE OF CALIFORNIA, COUNTY OF RIVERSIDE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Riverside, State of California. My business address is 4160 Temescal Canyon Road, Suite 610, Corona, CA 92883.

On February 28, 2025, I served true copies of the following document(s) described as **DECLARATION OF MILTON E. FOSTER III IN SUPPORT OF MOTION TO DISMISS** on the interested parties in this action as follows:

Robert Tyler
Julianne Fleischer
ADVOCATES FOR FAITH & FREEDOM
25026 Las Brisas Road
Murrieta, CA 92562
Telephone: (951) 600-2733
btyler@faith-freedom.com
jfleischer@faith-freedom.com

Attorneys for Plaintiffs T.S. and K.S.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address lspencer@f3law.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 28, 2025, at Corona, California.



Lisa Spencer